

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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OFFICE OF AIR AND RADIATION

April 24, 2003

CCD-03-02 (LDV/LDT)

SUBJECT: Guidance for Labeling Oil Fill Caps

Dear Manufacturer:

This letter provides an update on labeling oil fill caps for vehicles specifying use of International Lubricant Standardization and Approval Committee (ILSAC) GF-3 grade automotive engine oil.

<u>Background</u>: The subject of labeling oil fill caps was addressed in the July 31, 2001 EPA guidance letter CCD-01-12, <u>Use of GF-3 Engine Oils in Test Vehicles</u>. Labeling the oil fill cap with the lettering "GF-3" was one of six approval criteria discussed in the July 31, 2001 letter. At the May 8, 2002 EPA/Industry Meeting, EPA announced that the designation "GF-3" may be placed on a nearby label if there is not enough space to display it on the oil cap. EPA also stated that the API certification mark (starburst symbol) which represents conformance with the ILSAC standard could also be used in lieu of printing a reference to the GF-3 oil grade. Subsequently, members of the Alliance of Automobile Manufacturers (Alliance) met with staff from the EPA Certification and Compliance Division and presented results from a random survey of oil grades in the marketplace. These results showed 99% of the samples sold in North America were GF-3 compliant.

<u>EPA Determination</u>: Based on these results, EPA will allow vehicle manufacturers the flexibility of affixing only the viscosity grade on the fill cap, or placing the viscosity grade on an underhood label near the oil fill location. Permission to delete the GF-3 reference or starburst symbol from an underhood location is contingent upon the manufacturer <u>clearly</u> specifying the recommended oil for normal driving conditions in the vehicle owner's manual, including a graphic showing the starburst certification mark.

This determination is applicable for GF-3 grade oils only. EPA will issue a separate guidance letter on GF-4 oils if and when they are introduced into the marketplace and vehicle manufacturers propose to use GF-4 grade oils for official emission and fuel economy testing.

If you have questions concerning this letter, please contact Martin Reineman at 734-214-4430.

Gregory A. Green, Director

Certification and Compliance Division Office of Transportation and Air Quality